

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 7 and 10-22 are pending in the application, with claims 7 and 13 being the independent claims.

Based on the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

Claims 7 and 10-22 are rejected 35 U.S.C. § 102(b) as being anticipated by Ker et al. (U.S. Patent No. 6,765,771). Based on the following remarks, Applicants respectfully traverse.

Independent claim 7 recites, among other features, "a second diode coupled to ground, said second diode having an n+ and a p+ diffusion region on said first area of P-substrate". Ker does not teach or suggest this feature of claim 7. Note that the SCR device of Ker is isolated from the common P-substrate 30, as a deep N-well 32 lies under the whole SCR device (Ker, col. 4, lines 7-9 and lines 22-23). Accordingly, Ker does not teach or suggest a diode having an n+ and a p+ diffusion regions on the P-substrate as recited in claim 7. Further, note that the n+ and p+ diffusion regions in Ker (FIGs. 3a, 3b, 4a, 4b) always fall in either an N-well or a P-well. This is not the case for the second diode recited in claim 7 which falls on the P-substrate (see FIG. 4 of specification, for illustration).

Independent claim 7 further recites, among other features, "one or more third diodes ... having an n+ and a p+ diffusion region on a second area of P-substrate separated by a deep N-well from said first area of P-substrate". Note that only the third diodes fall on this second area of the P-substrate that is separated by a deep N-well from the first area of the P-substrate (see FIG. 4 of specification, for illustration). This is specifically the case in order to force a voltage different than ground at the interconnection between the third diodes and the second diode, which is coupled to ground.

In contrast, the SCR device of Ker is isolated in its entirety from the P-substrate (Ker, col. 4, lines 22-23). Accordingly, one cannot identify a first P-substrate area and a second P-substrate area in Ker, wherein the two areas are separated by a deep N-well as recited in claim 7. Therefore, Ker does not teach or suggest this feature of claim 7.

Ker does not teach or suggest at least this feature of independent claim 7. Accordingly, Ker does not anticipate independent claim 7. Reconsideration and withdrawal of the rejection of claim 7 is respectfully requested.

Claims 10-12 and 22 depend directly from claim 7. For at least the reasons provided above with respect to claim 1, claims 10-12 and 22 are not anticipated by Ker. Reconsideration and withdrawal of the rejection of claims 10-12 and 22 is respectfully requested.

Independent claim 13 recites similar structural features as recited in independent claim 7. For at least the reasons provided above with respect to claim 7, claim 13 is not anticipated by Ker. Reconsideration and withdrawal of the rejection of claim 13 is respectfully requested.

Claims 14-21 depend directly from claim 13. For at least the reasons provided above with respect to claim 13, claims 14-21 are not anticipated by Ker. Reconsideration and withdrawal of the rejection of claims 14-21 is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 7 and 10-22 are rejected 35 U.S.C. § 103(a) as being unpatentable over Ker *et al.* (U.S. Patent No. 6,765,771). Based on the following remarks, Applicants respectfully traverse.

Claims 7 and 10-22 have been distinguished over Ker above. For at least the reasons provided above, claims 7 and 10-22 are patentable over Ker. Reconsideration and withdrawal of the rejection of claims 7 and 10-22 under 35 U.S.C. § 103(a) is respectfully requested.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided. Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Patrick E. Garrett", written over a horizontal line.

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